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1	REID RUBINSTEIN & BOGATZ
	I. SCOTT BOGATZ, ESQ.
2	Nevada Bar No. 3367
	BRAD LIPMAN, ESQ.
3	Nevada Bar No. 14567
	300 South 4th Street, Suite 830
4	Las Vegas, Nevada 89101
	Telephone: (702) 776-7000
5	Facsimile: (702) 776-7900
	sbogatz@rrblf.com
6	blipman@rrblf.com
	Attorneys for Defendant
7	The Animal Foundation
8	

BRIAN BORENSTEIN,

### UNITED STATES DISTRICT COURT

#### DISTRICT OF NEVADA

Plaintiff, THE ANIMAL FOUNDATION, et al., Defendants.

Case No.: 2:19-cv-00985-CDS-NJK

ATION TO EXTEND TIME FOR JOINT PRE-TRIAL ORDER DEADLINE

(Second Request)

Defendant The Animal Foundation ("TAF") and Plaintiff Brian Borenstein ("Borenstein"), by and through their respective counsel, hereby request the Court to extend the deadline for the Joint Pre-Trial Order from Thursday, July 24, 2025 to Wednesday, August 20, 2025.

Since the parties' first stipulation on this matter and the Court's order thereto [ECF No. 493], the parties have been working to prepare the joint pretrial order; however, they desire additional time to continue completing this collaborative endeavor. Given the scope of this case, other coinciding deadlines in other cases, and scheduling matters for the parties' counsel, the parties submit that this request is made in good faith and not for the purpose of undue delay. Counsel for both parties are actively engaging in discussions concerning the possibility of settlement and further mediation while also preparing for trial.

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(702) 776-7000 | FAX: (702) 776-7900

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If these settlement discussions seem fruitful but do not result in a final agreement, potentially due to a mediator's schedule, an additional request to extend this deadline may be necessary. The parties do not anticipate any additional delay in preparing the joint pretrial order but for the aforementioned potential settlement.

# STIPULATED AND AGREED by:

DATED this 24th day of July, 2025.

DATED this 24th day of July, 2025.

### **REID RUBINSTEIN & BOGATZ**

# THE PALMER LAW FIRM, P.C.

By: /s/ Brad Lipman, Esq. I. Scott Bogatz, Esq. State Bar No. 3367 Brad Lipman, Esq. State Bar No. 14567 300 S. Fourth Street, Suite 830 Las Vegas, Nevada 89101 (702) 776-7000 sbogatz@rrblf.com blipman@rrblf.com Attorneys for The Animal Foundation By: /s/ Raelene K. Palmer, Esq. Raelene K. Palmer, Esq. Nevada Bar No. 8602 6605 Grand Montecito Pkwy., Suite 100 Las Vegas, Nevada 89149

Robert S. Melcic, Esq. Nevada Bar No. 14923 4930 Mar Vista Way Las Vegas, Nevada 89121

Richard E. Retamar, Admitted Pro Hac Vice Retamar & Millian, P.A. 685 E. Hillsboro Blvd. Deerfield Beach, Florida 33441 Attorneys for Plaintiff Brian Borenstein

### <u>ORDER</u>

The Court, having considered the above Stipulation and good cause appearing, GRANTS the Stipulation. IT IS HEREBY ORDERED that the time to file a Joint Pre-Trial Order is extended, moving the deadline to file to August 20, 2025.

UNITED STATES MAGISTRATE JUDGE

Dated: July 25, 2025